

**IN THE UNITED STATES DISTRICT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Newport News Division**

**BOBBY BLAND, DANIEL RAY CARTER,  
JR., DAVID W. DIXON, ROBERT W.  
MCCOY, JOHN C. SANDHOFER, and  
DEBRA H. WOODWARD**

**Plaintiffs,**

**CASE NO. 4:11-CV-45**

**v.**

**B.J. ROBERTS, individually and in his official  
capacity as Sheriff of the City of Hampton,  
Virginia**

**Defendant.**

**DECLARATION**

I, Cayetano Coronado, having direct knowledge of the information set forth below, hereby depose and declare as follows:

1. I am a citizen and resident of the Commonwealth of Virginia and the United States. I maintain my principal residence at 807 Berkshire Terrace, Hampton, Virginia 23666. My daytime phone number is 757-826-8719.
2. I was employed as a Deputy Sheriff in the Hampton Sheriff's Office from 1996 until July of 2010.
3. I worked for the Hampton Sheriff's Office during Sheriff B. J. Robert's re-election campaign in the fall of 2009.
4. While I was employed with the Hampton Sheriff's Office, I was told by my supervisor that if I wanted to remain in a favorable assignment and, more specifically, "if you want to remain where you're at" that "you need to support the Sheriff." This was related to me

**Exhibit 22**

Declarant's Initials: CC

by my supervisor, Captain Hardy, when he told me I needed to work the polls for the Sheriff in 2005. Captain Hardy and other supervisors would frequently say that the Sheriff would find out who supported him and who did not, and the clear implication was that your job or career would be in jeopardy if you opposed him.

5. The Sheriff held an annual golf tournament. The proceeds of the golf tournament were used to support his re-election efforts. Major Richardson frequently told me that I had to take several tickets to the event and either “buy them” or “sell them.” It was always presented to me in a way that led me to conclude that this was a requirement and there would be adverse consequences for refusing.

6. Sometime in the late summer of 2009, Sheriff Roberts spoke to a meeting that I attended with several of my co-workers. The Sheriff spoke for several minutes. He appeared to be upset. He stated that he would find out if any of us got on Facebook supporting his opponent, Jim Adams, in the 2009 election. He said that he would be Sheriff of Hampton as long as he wanted to be Sheriff. He stated that we could get on the “long train” or the “short train” and, while I do not remember the exact language he used, he made it clear that if he learned of our support for Jim Adams that we would lose our jobs.

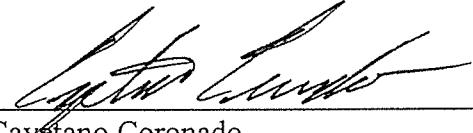
7. On election day in November of 2009, I voted at Kraft Elementary at the same time that David Dixon voted. I voted with my wife that day, Krystal Coronado. As we left the voting location, Francis Pope, who was handing out voting literature on behalf of the Sheriff at that precinct, stated to me something to the effect of “you are not going to believe what Dixon said,” he [Dixon] told me that I could “throw that stuff away”. Pope was referring to the Sheriff Roberts’ campaign literature that she was handing out. Pope was very animated when she

reported this to me. She did not report that Dixon used any type of expletives or obscene language.

I declare under penalty of perjury under the laws of the United States that the foregoing statement is true and correct.

Date:

10/24/11

  
\_\_\_\_\_  
Cayetano Coronado